

United States District Court  
for the

WESTERN

DISTRICT OF

OKLAHOMA

UNITED STATES )

)

v. )

)

JUSTIN RANDALL BROWN )

)

Case No: M-23- 980-SM

**CRIMINAL COMPLAINT**

I, Timothy C. Doyle, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about October 27, 2023, within Indian County, in the Western District of Oklahoma, the defendant, Justin Randall Brown, an Indian, violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. §§ 113(a)(3) and 1153	Assault with a Dangerous Weapon
18 U.S.C. §§ 113(a)(6) and 1153	Assault Resulting in Serious Bodily Injury
18 U.S.C. §§ 113(a)(7) and 1153	Assault Resulting in Substantial Bodily Injury to an intimate partner or dating partner
18 U.S.C. § 922(g)(1)	Felon in Possession of a Firearm

This criminal complaint is based on these facts:

See attached Affidavit of Special Agent Timothy C. Doyle, Federal Bureau of Investigations (FBI), which is incorporated and made a part hereof by reference.

Continued on the attached sheet.

Complainant's signature

Timothy C. Doyle  
Special Agent  
FBI

Judge's signature

Sworn to before me and signed in my presence.

Date: 12/4/23

City and State: Oklahoma City, Oklahoma

Suzanne Mitchell, U.S. Magistrate Judge  
Printed name and title

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA**

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Special Agent Timothy Doyle, being duly sworn, depose and state that:

**INTRODUCTION**

1. I am a Special Agent of the United States Federal Bureau of Investigation ("FBI") within the meaning of Section 2510(7) of Title 18, United States Code and am empowered by law to conduct investigations of, and to make arrests for, federal offenses as set forth in Section 2516 of Title 18, United States Code. I have been a Special Agent of the FBI since September 20, 2015. I have received four months of training in criminal investigations and related legal matters at the FBI Training Academy in Quantico, Virginia. Upon completion of training at the FBI Training Academy until August 2019, I was assigned to the San Antonio Division, Laredo Resident Agency. I am currently assigned to the Oklahoma City Division, Stillwater Resident Agency. Prior to employment with the Federal Bureau of Investigation I was a certified Peace Officer with the City of Enid, in the State of Oklahoma, from April 4, 2005, until September 10, 2015. Through my training and experience, I have become familiar with and used all normal methods of investigation, including, but not limited to, visual surveillance, witness interviews, search and arrest warrants, confidential human sources, pen registers, undercover agents, and court authorized wiretaps.

2. The statements contained in this Affidavit are based in part on: information provided by other agencies, written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents; independent investigation; and my experience, training, and background as a Special Agent with the FBI. Because this Affidavit is being

submitted for the limited purpose of establishing probable cause to believe that Justin Randall Brown, committed the below-described offense, I have not included every detail of the investigation. In addition, unless otherwise indicated, all statements contained in this Affidavit are summaries in substance and in part. The following is true to the best of my knowledge and belief.

**PROBABLE CAUSE**

3. As will be shown below, there is probable cause to believe that Justin Randall Brown committed the crime of Assault and Battery with a Dangerous Weapon, in violation of 18 U.S.C. §§ 113(a)(3) and 1153(a), Assault Resulting in Serious Bodily Injury, in violation of 18 U.S.C. §§ 113(a)(6) and 1153(a), Assault of a Spouse, Intimate Partner, or Dating Partner Resulting in Substantial Bodily Injury, in violation of 18 U.S.C. §§ 113(a)(7) and 1153(a); and Felon in Possession of a Firearm, in violation of 18 U.S.C. § 922(g)(1).

4. VENUE: The facts and circumstances alleged in this affidavit occurred while the victim was within the Western District of Oklahoma. Specifically, while within the boundaries of tribal land belonging to the Otoe-Missouria Tribe.

5. DEFENDANT: The defendant is Justin Randall Brown (Brown). Brown is a confirmed member of the Otoe-Missouria Tribe.

6. VICTIM: The victim is, M.Z., intimate female partner of the defendant. M.Z. is a confirmed member of the Comanche Nation.

7. On October 27, 2023, Stillwater Police Detective David Adney (Det. Adney) was on call when he was advised a female had shown up in the emergency room who had been beaten and shot in the leg. The female was identified as M.Z. Det. Adney went to Stillwater Medical Center (SMC) and made contact with Stillwater Police Officer's Howell and Rivera. Officer Howell

stated M.Z. had been beaten resulting in large contusions on her head, multiple lacerations about her head and face, a stab wound on her right shoulder, and a single gunshot wound to her left leg.

8. M.Z. had driven herself to SMC at approximately 1800 hours. Officer Howell stated he found M.Z.'s vehicle in the SMC parking lot. The car was a gold, 1999 Mazda 626 with Iowa state tag NNM907. Officer Howell looked through the window and observed minimal blood in the passenger seat along with a used first aid kit in the floorboard.

9. Det. Adney introduced himself to M.Z. and began his investigation. Det. Adney documented injuries with photos and his body worn camera (BWC) throughout their interaction. Det. Adney observed a significant amount of dried blood on M.Z.'s face. M.Z. had a cut over her left eye and left side of her head. A large contusion approximately the size of an egg was on the left side of her head above her ear. She had a cut on her right cheek which was swollen along with her right eye. There was a stab wound approximately one inch wide on her ride shoulder by her clavicle. There were scratches on her back and a large contusion about the size of an orange on the back of her head. There was a single gunshot wound on her left thigh. A small circular hole was on the underside of M.Z.'s thigh near the outside of her left leg. A large hole approximately 2" by 2" was in the front of her thigh approximately 6" above her knee.

10. Det. Adney asked M.Z. if she would allow the SPD to search her vehicle and she agreed. Det. Adney read the "Consent to Search" form to M.Z. and she signed the form. Officer Howell assisted Det. Adney with the search of the vehicle and the collection of evidence. Det. Adney photographed the vehicle from the exterior to the interior. The only blood found in the vehicle was in the passenger seat where the left leg of M.Z. would have been if she was sitting there. The passenger floorboard had some bloody gauze bandages, empty gauze packaging, and a first aid kit. There was a roll of medical tape between the passenger seat and the car door. Det. Adney

collected the following items as evidence;

11. In the passenger door panel: triangle bandage, medical scissors, disinfectant cleaning wipe wrapper, and bloody gauze with wrapper.

12. On the passenger floorboard: used first aid kit, sterile gauze pad box, empty gauze wrappers, and pair of pink socks with blood drops.

13. Det. Adney also interviewed M.Z. and was told that she was assaulted and shot at a Neighborhood Walmart in Stillwater, Oklahoma. M.Z. gave many details about the assault, and stated she did not know who the assailant was. Based on this interview, SPD officers went to the referenced Walmart and reviewed video footage from the Walmart. However, they found no evidence supporting M.Z.'s story of being assaulted outside a Walmart.

14. At approximately 1000 hours on October 28, 2023, Det. Adney went to the residence of C.Z., mother of M.Z. Upon arrival Adney spoke with C.Z. and was introduced to J.M., the father of M.Z.'s children. J.M. stated he would like to speak with Det. Adney when he was done speaking with C.Z. because he had pertinent information to share.

15. C.Z. said M.Z. had a boyfriend named Justin (Brown). C.Z. believed Brown had been the one who shot M.Z. C.Z. said Brown was violent and had beaten M.Z. up multiple times. C.Z. said there was previously an incident in Bethany, Missouri where Brown pulled a gun on M.Z. C.Z. did not know any information about Brown other than he was an Otoe-Missouria Tribal member and lived on tribal land by Red Rock, Oklahoma.

16. Det. Adney next spoke with J.M. who provided a full name for M.Z.'s boyfriend, Justin Randall Brown. J.M. was aware of several incidents of abuse by Brown against M.Z.. J.M. advised he had received text messages from M.Z. after Brown had beaten her and even raped her with a gun barrel. J.M. also mentioned the incident in Bethany Missouri. J.M. said Brown had threatened

to hurt his and M.Z.'s children as well. J.M. believed M.Z. had been beaten and shot at Brown's house.

17. At approximately 1600 hours on October 28, 2023, M.Z. was interviewed by Det. Adney at the Stillwater Police Department. The entire interview was recorded. M.Z. confirmed Brown was the person who had assaulted her.

18. FBI Special Agent Tim Doyle met with and interviewed M.Z. at the FBI Office in Stillwater, Oklahoma on November 20, 2023.

19. M.Z. met Brown through her cousin I.A. Brown had known several members of M.Z.'s family for a while. By New Year's Day of 2023 M.Z. and Brown were in a committed relationship. Early in their relationship Brown mentioned to M.Z. that she should look up his past but M.Z. never did.

20. Within just a few days of the two of them being in a full-time relationship M.Z. was already having bad feelings about Brown but she also felt that it was nice to be with someone all the time, so she ignored the feelings.

21. From January until March of 2023 they were together almost every day. About March 20, 2023, M.Z. and her two minor sons moved out to Brown's property located at 14680 County Road 170, Red Rock, Oklahoma. M.Z. described the property as two small sheds. One had the kitchen area and the other was a bedroom with a loft area.

22. At some point in the first few months of dating, M.Z. and Brown were driving to Riverside Casino in Tulsa and Brown began talking about the murders of some women in Tulsa. M.Z. was uncomfortable by that conversation and remembers feeling at that time that he may end up being the death of her.

23. Around April 28, 2023, M.Z. and Brown were staying in Winterset, Iowa with C.M..

M.Z.'s sons were both staying in Stillwater at M.Z.'s mother's home during this time. They had gone to stay with C.M. because M.Z.'s father lives in Iowa and had been put on Hospice Care.

24. M.Z. borrowed a GMC truck from C.M. to go get alcohol but Brown became upset and thought M.Z. was trying to leave him in Iowa, so he jumped up and decided to go with M.Z.. Brown was upset and drove around aimlessly for a couple of hours before finally making it to Interstate 35 and driving south back towards Oklahoma. Shortly after getting into Missouri, Brown stopped at a rest stop. They both slept for a short while and then M.Z. woke up and began driving the truck. M.Z. drove to the next turnaround area on the interstate and started going back north. Brown woke up while M.Z. was driving and began beating her and throwing her belongings out of the truck. Brown also pointed a gun at M.Z.'s head while she was driving. M.Z. ended up pulling onto an exit ramp near Bethany, Missouri.

25. M.Z. described the gun as a 9mm, black in color, with a square shaped barrel. M.Z. knew the gun was a 9mm because Brown had let her and her son's shoot it before and she had bought ammunition for him. M.Z. remembered having purchased ammunition at Atwoods in Stillwater and specifically recalled Brown asking for hollow point ammunition. Brown had also told M.Z. he had been to prison and wasn't supposed to own a gun.

26. Brown began driving again after they pulled over. M.Z. began yanking on the wheel and honking the horn because she had been told by C.M. that C.M. had reported the truck as stolen. Eventually Brown stopped so M.Z. jumped out of the truck and began walking down the road and into and out of traffic. Brown drove off and left her.

27. M.Z. was eventually picked up by Missouri State Police. They drove her to a hotel. M.Z. later learned Brown drove to an area near Kansas City before finally running out of gas and then calling his mother to come pick him up.

28. Prior to the trip to Iowa, Brown had threatened M.Z. with the gun on multiple occasions. Once while they were at his property, they were arguing about the TV show "Handmaid's Tale" and Brown put the loaded gun into her vagina. Another time Brown hit M.Z. in the head with the gun and then unloaded it and put it in her vagina. M.Z. remembers thinking to herself "at least he unloaded it this time" when he did it. She said this happened after her kids had left for school. During the incident Brown told M.Z. he didn't want to live without her. After the incident she contacted White Eagle Transport, and they came to pick her up and drove her to go get groceries. After she returned from the store Brown apologized to her.

29. Often Brown would threaten someone was going to take her sons away from her or he would threaten to kill both of them. Brown would tell M.Z. he would make sure to kill one of her sons first since Brown believed this son was her favorite, but he would kill the other as well.

30. During one argument around the end of March of 2023, Brown shot a bullet past M.Z.'s head while she was on the bed. The bullet went through the wall and out of the building. M.Z. said every time she went outside, she could see the hole in the outside of the shed. After Brown shot that bullet at her he was out of ammunition and was pointing the gun up to the loft area where one of her sons was sleeping. They continued arguing and Brown pulled the trigger again while the gun was pointed to the area her son was sleeping.

31. Around, or shortly after, October 9, 2023, M.Z. and her two sons went to live at Wings of Hope in Stillwater.

32. On or about October 27, 2023, M.Z. had been missing Brown and they seemed to have been on good terms so M.Z. went to visit him at his property. The two of them had sex and were laying together just hanging out for a while. M.Z. told Brown that one of her sons had a school parade so she needed to leave to go to that. Brown became very upset and began abusing and

threatening her at that time. Brown had a Kukri (similar to a machete) and was beating M.Z. on the head with it. Brown also was threatening to kill all her friends and family. Brown claimed to be part of the Indian Brotherhood and also told her he was on federal land, so he could do whatever he wanted, and she couldn't do anything about it.

33. At one-point M.Z. was squatting on the bed while they were arguing, and Brown was standing in front of her. M.Z. remembers Brown looked her right in the eyes and pointed the gun at her thigh and shot her. After he shot M.Z., she put her head against the barrel of the gun and told him to shoot her again and kill her quickly. Brown told M.Z. he had already dug a hole for her body on the property. Brown also told M.Z. he killed a woman (possibly named Mary) and buried her on the property and said he had killed a man and buried him under the tiny house (shed) they were in.

34. The abuse and arguing continued until Brown said he needed cigarettes. Both of them got into her car and drove to the gas station. M.Z. had a first aid kit in her car so she began treating her wounds in the car. She recalled thinking he may be taking her somewhere to finish her or dump her, so she kept throwing the bloody gauze out of the window to leave evidence on the roadway.

35. After going to the gas station, they returned to Brown's property and Brown held M.Z. until he fell asleep. Brown had taken the car keys and had them in his pocket and Brown had also taken M.Z.'s glasses but M.Z. had no idea where they were at.

36. Brown was holding M.Z. tight and she was getting a headache and feeling like she was going to throw up. Brown finally gave M.Z. the car keys so she left and drove herself straight to Stillwater Medical Center Emergency Room. M.Z. was initially treated at Stillwater Medical and then transferred to OU Medical.

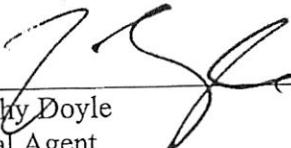
37. After this incident, Brown and M.Z. have had no contact, although M.Z. did send Brown some messages on Facebook Messenger. M.Z. said Brown never replied to any of those messages and does not believe he reviewed them.

38. Based on a criminal history review of Brown, it was determined that he is a convicted felon and is not permitted to possess a firearm.

**CONCLUSION**

39. Based on a review of this case, and based on my knowledge and experience, I, as your Affiant have probable cause to believe Justin Randall Brown committed the crime of Assault and Battery with a Dangerous Weapon, in violation of 18 U.S.C. §§ 113(a)(3) and 1153(a), Assault Resulting in Serious Bodily Injury, in violation of 18 U.S.C. §§ 113(a)(6) and 1153(a), Assault of a Spouse, Intimate Partner, or Dating Partner Resulting in Substantial Bodily Injury, in violation of 18 U.S.C. §§ 113(a)(7) and 1153(a); and Felon in Possession of a Firearm, in violation of 18 U.S.C. § 922(g)(1). Therefore, I respectfully request that the Court issue a Criminal Complaint and Arrest Warrant for Justin Randall Brown.

Respectfully Submitted,

  
\_\_\_\_\_  
Timothy Doyle  
Special Agent  
Federal Bureau of Investigation

Sworn and subscribed this 4<sup>th</sup> day of December 2023.

  
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Suzanne Mitchell  
United States Magistrate Judge